

AMERILAW FIRM

Attorneys At Law

March 26, 2025

Via Electronic Filing:

Magistrate Judge Peggy Kuo
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**RE: State Farm Mut. V. Metro Pain
Case No.: 1:21-cv-05523**

Dear Judge Kuo:

As your Honor is aware this firm represents Michael Torres in the limited capacity of addressing the Subpoena addressed to him and the pending Order to Show Cause relating to the same.

We have done a diligent search and turned over all documents found within the email accounts as of March 5, 2025, in the manner prescribed by the Plaintiffs. There remains working out language on an Affidavit by Mr. Torres to obviate the need for his deposition.

While Plaintiffs counsel sent this to our office earlier, I was out for the Persian New Year amongst other logistical issues and got them back redlined changes today, while waiting on client approval. I am hopeful we can resolve the language in the Affidavit to satisfy their requests and avoid the need for a deposition.

I have Plaintiffs counsels consent to request that the hearing for Friday be done, at the Courts discretion of course, via telephone. This would avoid the need for an appearance from all parties. I am also out of the Country and would have had to send another attorney in my stead if it proceeded in person.

I believe we are near the finish line with this issue and am not requesting an adjournment, but rather having the matter conferenced Friday via telephone. We thank the Court for its time and attention in this matter.

Respectfully Submitted,
AMERI LAW FIRM, LLC

/s/ Nima Ameri
Nima Ameri, Esq.

CC: All Counsel of Record

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